UNITED STATES DISTRICT COURT WESTERN DISTRICT OF NEW YORK

CAROL S. MARCELLIN, individually, and as Co-Administrator of the Estate of Charles E. Hollowell, deceased, and JESSICA HOLLOWELL-McKAY, as Co-Administrator of the Estate of Charles E. Hollowell, deceased,

Civ. No. 1:21cv-00704-JLS

Plaintiffs,

v.

HP Inc., and STAPLES, INC.,

Defendants.

DECLARATION OF JACLYN WANEMAKER IN SUPPORT OF MOTION FOR PROTECTIVE ORDER

Pursuant to 28 U.S.C.§ 1746, I, Jaclyn Wanemaker, declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information and belief:

1. I am an attorney duly admitted to practice in the State of New York and a partner in the firm of Smith Sovik Kendrick & Sugnet P.C., attorneys for Defendant HP Inc. ("HP") herein, and as such, I am fully familiar with the facts and circumstances surrounding this case. I make this declaration in support of HP's Motion for Protective Order forbidding the deposition of David Pipho.

 Attached hereto as Exhibit A is a true and correct copy of the plaintiff's STATE OF NEW YORK STANDARD FIRE CLAIM FORM (NYFC-1) PART 2.

WHEREFORE, for the reasons set forth above, HP's motion for a protective order forbidding the deposition of David Pipho should be granted.

DATED: Friday, March 1, 2024

Jaclyn S. Wanemaker, Esq.

SMITH SOVIK KENDRICK & SUGNET, PC

Attorneys for Defendant HP Inc.

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